UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

AUG 14 2019

CERTIFIED MAIL 7018 2290 0000 6353 9151
RETURNED RECEIPT REQUESTED

Mr. Mark Lunders
Plant Manager
Concrete Supply Company
400 Minuet Lane
Charlotte, North Carolina 28210

Re: Compliance Evaluation Inspection
Concrete Supply Co. Charlotte-South, Charlotte, North Carolina, Permit NCG140043

Dear Mr. Lunders:

On May 30, 2019, the U.S. Environmental Protection Agency Region 4 conducted a Compliance Evaluation Inspection (CEI) at the Concrete Supply Company Charlotte-South facility located at 400 Minuet Lane, Charlotte, North Carolina. The purpose of the CEI was to evaluate the facility's compliance with the requirements of Sections 301 and 402(p) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and, the State of North Carolina's industrial stormwater and wastewater regulations.

The EPA appreciates your cooperation in conducting this CEI. Enclosed is the EPA's CEI report, evaluating your compliance with the CWA. As a result of the inspection, the EPA may be in further contact with Concrete Supply Company in the future.

While a response from you is not required at this time, if you do wish to respond to the CEI report, provide additional information, or otherwise discuss the report, please contact Mr. Mark Robertson at the above address or by email at Robertson.Mark@epa.gov.

Sincerely,

Daniel J. O'Lone, Chief
Surface Water and Ground Water Section
Water Enforcement Branch

Enclosures

cc: Ms. Annette Lucas
NCDEQ

Mr. Johnie Alexander
CSC LLC

U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW, Atlanta, GA 30303

Water Compliance Inspection Report

FACILITY DATA

NPDES ID: NCG140043	Effective Date: 04/01/2017	Expiration Date: 06/30/2022
Facility Name: Concrete Supply Company – South Plant		SIC Code: 3273
Address: 400 Minuet Lane, Charlotte, NC 28210		

On-Site Representative(s), Title, Phone Number:	Responsible Official, Title, Phone Number, Mailing Address:
Mark Lunders Plant Mgr. 400 Minuet Lane Charlotte, NC 28210	Johnie Alexander 3823 Raleigh Street, Charlotte, NC 28206 Johnie.Alexander@concretesupplyco.com

INSPECTION ENTRY DATES/TIMES

Entry Date/Time: 05/30/19 @ 9:50 am	Exit Date/Time: 05/30/19 @ 1:00 pm

NAMES OF EPA AND STATE INSPECTORS

EPA Inspectors: Mark Robertson, Kenneth Kwan
NCDENR Inspector: Chris Graybeal
Charlotte-Mecklenburg Inspector: Ron Eubanks

AREAS EVALUATED DURING INSPECTION *(Check those areas evaluated)*

X	Permit	X	Self-Compliance Program		Pretreatment
X	Records		Compliance Schedule	X	Pollution Prevention
X	Facility Site Review		Laboratory	X	Storm Water
X	Effluent / Receiving Waters	X	Operations & Maintenance		Combined Sewer Overflow
	Flow Measurement		Sludge Handling/ Disposal		Sanitary Sewer Overflow

INSPECTION NOTES

This is a joint state, local and EPA Compliance Evaluation Inspection (CEI) focusing on North Carolina's General Permit No. NCG140000 for stormwater discharges and process wastewater discharges.

EPA REPRESENTATIVES

Inspector Signature/Name	Office/Phone Number	Date
Mark Robertson, Environmental Engineer	USEPA Region 4/ECAD-WEB-SGS 404-562-9639	7/25/19
Kenneth Kwan, Environmental Engineer	USEPA Region 4/ECAD-WEB-SGS 404-562-9752	7/22/19
Management Signature/Name	**Office/Phone Number**	**Date**
Daniel J. O'Lone, Chief Stormwater and Residuals Enforcement Section	USEPA Region 4/ECAD-WEB-SGS 404-562-9434	8/2/19

1. FACILITY LOCATION INFORMATION							
GPS Coordinates	**Latitude**	35.1564488° N		**Longitude**	-81.8827296° W		
Receiving Water(s) or MS4	Kings Branch		**Site Acreage**	7.5 acres	**Weather Condition**	Clear	
Date of NOI (or No Exposure Exclusion per 122.26(g))	N/A	**SIC Code(s)**	3273	**Discharge to 303(d) listed or TMDL waters**	No	**Does the site discharge pollutants contributing to the receiving stream impairment?**	N/A

2. BASIC STORMWATER POLLUTION PREVENTION PLAN (SPPP) INFORMATION			
SPPP TOPICS (Part III)	**YES**	**NO**	**N/E**
SPPP on-site **Section 9** A copy of the SPPP dated April 15, 2012, and updated on March 3, 2019, was made available onsite for review during the inspection.	X		
Site Description **Section 1**	X		
Identify potential Pollutant Sources and Particular Pollutants **Section 1(b)** Three potential pollutant sources were not addressed in the SPPP: 1. Rinsing of concrete residue from the back of the concrete truck to the ground outside of the concrete washout basin 2. Areas for drying out excess concrete were not evaluated for potential contaminated runoff 3. Concrete trucks were being washed with detergent		X	
Site Maps (general location map and site specific map) **Section 1(c)** The SPPP and the site map was not updated to reflect the removal of the pond.		X	
Spill History (3 year history or spills and corrective actions) **Section 1(d)** An annual spill history log was maintained by the facility and kept in its SPPP.	X		
SPPP Certification **Section 1(e)** The annual certifications were available at the site, with the most recent certification being dated 04/08/19.	X		
Stormwater Management Strategy (Feasibility Study) **Section 2(a)** The feasibility study did not evaluate the option of minimum exposure of materials and processes to rainfall or diverting the stormwater away from areas of potential contamination as required in the permit.		X	
Stormwater Management Strategy (Secondary Containment) **Section 2(b)** The SPPP did not include a table or summary of all above storage tanks and their associated secondary containment as required by the permit. The table or summary must include the capacities of both the tanks and the containment structure.		X	
Stormwater BMP Summary **Section 2(c)**	X		
Spill Prevention & Response Procedures (SPRP) **Section 3**	X		

2. BASIC STORMWATER POLLUTION PREVENTION PLAN (SPPP) INFORMATION			
SPPP TOPICS (Part III)	**YES**	**NO**	**N/E**
Preventative Maintenance and Good Housekeeping Program **Section 4** The criteria for frequency and method for cleaning out the concrete washout basins was not discussed in the SPPP. Good housekeeping practice concerning routine clean-up of concrete dust and solid deposits was lacking adequate detail on criteria for cleaning, site sweeping schedule, and type of equipment utilized.		X	
Employee Training **Section 6**	X		
Identify the Responsible Party for Implementing the SPPP **Section 7**	X		
SPPP Modified or Update to Current Conditions **Section 8** The review of the SPPP showed that it was not updated to the current conditions at the site. The site map in the SPPP did not reflect the removal of the pond located at the southwest side of the facility. The operation and maintenance of the recently installed CO_2 pH treatment system was not addressed in the SPPP. The large diversion berm at the northside of the facility was not addressed in the SPPP or identified on the site map.		X	
Schedule and Procedures for Routine Inspections **Section 5** Routine facility inspections were conducted semi-annually.	X		

3. SITE DESCRIPTION and SPPP
The facility is a central mix plant. A predetermined amount of aggregates, cement, fly ash, and admixture are mixed in a central mixer. The final products, depending on the mix design requirements, are loaded from the central mixer directly into each individual concrete truck. The plant has a fleet of 15 concrete trucks. Maintenance of these trucks is conducted offsite at a central location. Average monthly production rate is around 8,000 to 10,000 cubic yards of concrete. All the runoff from the production area drains toward the east side of the facility and collects in a concrete ditch. Wastewater and stormwater from the ditch is pumped through a CO_2 treatment system for pH adjustment prior to discharge via outfall #1.

4. RECORD REVIEW			
Record Review	**YES**	**NO**	**N/E**
Representative on-site	X		
Records documenting Certificate of Coverage (COC) **Part I, Section B** The COC document was signed 8/1/17.	X		
List of detergents, additives, polymers, brighteners, and cleaning agents **Part II Section B(9)**			X
Records of SPPP Implementation available at site **Part III Section 9, Part V Section D(6)** Generally, the records were available for review on-site. However, some materials were kept at the corporate central office, including corrective action reports and originals of the site inspection worksheets. Those documents were not reviewed as part of the inspection.	X		
Maintenance and Housekeeping Programs **Part III Section A(9), Part V Section D(6)**	X		

4. RECORD REVIEW			
Record Review	**YES**	**NO**	**N/E**
Records of Routine Inspections **Part III Section A(9), Part V Section D(6)** Some of the records were kept at a central office location instead of at the facility. Electronically generated report copies were available on-site and those were reviewed by the inspection team.	X		
Records of Employee Training **Part III Section A(9), Part V Section D(6)**			X
Approval of Representative Outfalls **Part III Section D(5), Part V Section D(6)**			X
Records of Benchmark Monitoring **Part IV**			X
Records of Monitoring **Part IV Sections C and D** Reports for effluent monitoring noted that the samples were not representative of the "first flush" of discharge due to the time lag between the start of the rain event and the grab sample collection. (e.g., 3/18/19, 10/26/18, 9/27/18, 3/6/18, and 12/20/17) Staff noted that the contractor, Prism, could not get to the facility within the 30 minute window on many occasions. Effluent sample data noted below indicates either benchmark exceedances or failure to sample: Sample from March 8, 2019 had a pH of 11.54 and TSS of 190 mg/L. Sample from October 26, 2018 had a pH of 11.59 and TSS of 330 mg/L. Sample from June 27, 2018 indicated no flow. No samples were analyzed for that calendar quarter. Sample from March 6, 2018 had a pH of 9.8. Sample from December 20, 2017 had a pH of 10.2. Sample from September 11, 2017 had TSS of 130 mg/L. Sample from May 23, 2017 had TSS of 140 mg/L. Sample from March 28, 2017 had a pH of 10.4. Sample from January 15, 2016 had a pH of 10.2. No records were on-site in the SPPP for responses to apparent effluent limit exceedances noted above. The CO_2 pH adjustment system was installed in March 2019. See photo DSCN1804.		X	
Records of Tiered Approach to Benchmark Exceedances **Part III.D(5), Part V.D(6)** Information about tiered responses to benchmark exceedances was unclear. The facility installed a pH adjustment system in March 2019 to counteract high pH readings in effluent. Photos DSCN1794-1796 show a copy of the three-page form.	X		
Records of Stormwater Bypasses **Part V Sections C(3)**			X
Records of Wastewater Bypasses **Part V Sections C(4)**			X
Records of 24 hour Reporting **Part V Sections E(8-10)**			X

5. SITE EVALUATION & SPPP IMPLEMENTATION	
Pollutant Sources	**Note location, quantitative description, design issue, O&M deficiencies (including the nature and extent), and pollutants off-site**
Loading/Unloading Area	Raw materials arrive by truck or rail. Aggregate and sand are put into 3-sided concrete bins, while cement and fly ash are pneumatically pumped into silos.
Raw Material Storage Facilities	The 3-sided concrete bins for aggregate and sand were open to precipitation.
Outdoor Process Operations	No processing was done outside.
Housekeeping	The SPPP is not specific about site sweeping frequency and procedure. Concrete fines and dust were observed at various locations. See photos DSCN1800 and DSCN1810.
Liquid Storage Tanks	The secondary containment for concrete admixtures was cracked. See photo DSCN1797.
Best Management Practices (BMPs)	The slope along the berm was not adequately stabilized.
Spills/Leaks Handing	Spill kits at the fueling station were full of rainwater and not useable. See red bucket in photo DSCN1813.
Disposal/Waste Handling Areas	Drivers were observed washing the back end of the trucks and the chutes onto the paved area. See photo DSCN1800. Staff stated that the trucks were not being washed into the washout basins to avoid overfilling the basins. The wash water was flowing over the truck area and evaporating there. At the end of the day, the residual material from the washing was swept up dry. The washout basins were filled within a foot of the top at the time of the inspection.
Vehicle Maintenance Areas	No vehicle maintenance activities were observed during the inspection. Such activities were being conducted off site.
Material Stockpile Wetting Operations	Water from storage piles was captured for reuse. See photo DSCN1802 and 1803.
Mixing Drum Cleanouts	Drum cleanout water is captured and reused. See photo DSCN1812.

6. OUTFALL, STORMWATER DISCHARGE & RECEIVING WATER OBSERVATIONS			
Outfall, Stormwater Discharge & Receiving Water	**YES**	**NO**	**Description:**
Number & location of stormwater discharge(s)/outfall(s) consistent with the SPPP	X		One outfall was observed, as reflected in the SPPP.
Evidence of off-site accumulation of pollutants observed	X		The outfall was not discharging at the time of inspection. According to staff, the muddy water in the ditch was from the adjacent roadway drainage area, backing up towards their outlet structure. Discharged water from the facility would comingle with water in right foreground. See photo DSCN 1805.
Other potential discharges off-site (through outfalls not included in the SPPP)		X	
Non-stormwater discharge		X	

Additional inspection summary, narrative, findings, comments, photos, and schematic diagram of the facility area as necessary:

An exit conference was held with Mr. Lunders and Mr. Alexander.

A photolog is attached.

SPPP

1. Some of the effluent sampling results were permit effluent exceedances under Permit section IV.D, Table 8, and no information about self-reporting to NCDEMLR was available on-site.
2. The SPPP does not reflect the removal of the pond, and the map does not match current site conditions.
3. The operation and maintenance of the CO_2 pH treatment system is not included in the SPPP.
4. The large diversion berm at the northside of the facility is not included in the SPPP and identified on the site map. The slope along the berm was not adequately stabilized.
5. The good housekeeping practice concerning routine clean-up of concrete dust and solid deposits was lacking sufficient detail such as criteria for initiating sweeping, a sweeping schedule, and type of equipment utilized in the SPPP.
6. The feasibility study did not evaluate the option of minimum exposure of materials and process to rainfall or diverting the stormwater away from areas of potential contamination as required in the permit.
7. The criteria for frequency and method for cleaning out the concrete washout basins was not discussed in the SPPP.

Records and Report Review

Inspectors recommended keeping copies of inspection original pen-and-ink sheets at facilities, instead of only at HQ.

Onsite Evaluation

There were three outdoor industrial actives observed onsite that were not addressed in the SPPP.

a. Rinsing of concrete residue at the back of the concrete truck outside of the concrete washout basin.
b. Areas for drying out excess concrete, a potential contaminated runoff source.
c. Concrete truck washing with detergent.

CERTIFIED MAIL
RETURNED RECEIPT REQUESTED

Mr. Mark Lunders
Plant Manager
Concrete Supply Company
400 Minuet Lane
Charlotte, North Carolina 28210

Re: Compliance Evaluation Inspection
Concrete Supply Co. Charlotte-South, Charlotte, North Carolina, Permit NCG140043

Dear Mr. Lunders:

On May 30, 2019, the U.S. Environmental Protection Agency Region 4 conducted a Compliance Evaluation Inspection (CEI) at the Concrete Supply Company Charlotte-South facility located at 400 Minuet Lane, Charlotte, North Carolina. The purpose of the CEI was to evaluate the facility's compliance with the requirements of Sections 301 and 402(p) of the Clean Water Act (CWA), 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and, the State of North Carolina's industrial stormwater and wastewater regulations.

The EPA appreciates your cooperation in conducting this CEI. Enclosed is the EPA's CEI report, evaluating your compliance with the CWA. As a result of the inspection, the EPA may be in further contact with Concrete Supply Company in the future.

While a response from you is not required at this time, if you do wish to respond to the CEI report, provide additional information, or otherwise discuss the report, please contact Mark Robertson at the above address or by email at Robertson.Mark@epa.gov.

Sincerely,

Daniel J. O'Lone, Chief
Stormwater and Residuals Enforcement Section
NPDES Permitting and Enforcement Branch

Enclosures

cc: Ms. Annette Lucas
NCDEQ
Mr. Johnie Alexander
CSC LLC

Concurrence:

MR 7/25
Robertson

MR for 7/25
Kwan

bc: Mathis

Mailing addresses:

Ms. Annette Lucas, PE
Stormwater Program Supervisor
Division of Energy, Mineral and Land Resources
Department of Environmental Quality
512 N. Salisbury Street, Office 640-L, Raleigh, NC 27604
1612 Mail Service Center, Raleigh, NC 27699-1612

Mr. Johnie Alexander
Environmental Manager
Concrete Supply Co.
3823 Raleigh Street
Charlotte, NC 28206